

FILED

NOV - 7 2019

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL WILLIAM GREENE,

Defendant.

4:19CR930 SNLJ/SPM

MOTION FOR PRETRIAL DETENTION

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer J. Roy, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of felon in possession of a firearm in violation of Title 18, United States Code, Section 922(g).
2. According to Creve Coeur Police Department ("CCPD") 19-04807, the CCPD received an anonymous tip that an occupant of a red Jeep SUV was engaged in drug trafficking and in the possession of a firearm. The CCPD observed a red Jeep SUV commit a traffic violation and curbed the vehicle. The defendant was the driver of the vehicle. The defendant was found in possession of a quantity of what was later determined to be methamphetamine, a loaded firearm, and a bulletproof vest. The defendant was advised of his constitutional rights pursuant to *Miranda v. Arizona* and made a knowing and voluntary statement admitting his knowing unlawful possession of the controlled substance. The defendant stated that he was delivering the drugs as part of a drug transaction.

3. Pursuant to Title 18, United States Code, Section 3142(g), the circumstances of the charged conduct and the weight of the evidence against the defendant reflects that the defendant is a danger to the community and should be detained pending trial.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Jennifer Roy
JENNIFER J. ROY, #47203MO
Assistant United States Attorney